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Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re
PIERCE CONTRACTOR'S, INC.

Debtor

CASE NO. 21-50915-SLJ

**DECLARATION OF BRADLEY PIERCE
IN SUPPORT OF MOTION TO
ENCUMBER REAL PROPERTY AND
PLAN OF REORGANIZATION**

Chapter 11
[Subchapter V]

Date: None Set
Time: None Set
Court: Telephone or Video Only***

I, Bradley Pierce declare and say:

1. Richard Pierce is the sole stockholder of Debtor. I am his son.
2. Debtor is the owner of real property at 194 Lantz Dr. Morgan Hill, CA ["Property"]

hereinafter]. Dad, my brother and I live there. We pay rent or assistance of \$6,000/month between my brother and me.

3. We are aware that Debtor filed a Chapter 11 petition in an effort to save the Property. We want to assist Dad and the Debtor.

1 4. On February 27, 2017, my grandfather Nouri Hijazi was piloting his twin-engine
2 Cessna 310, departing from Riverside Municipal Airport (RAL) to Norman Mineta International
3 Airport in San Jose (SJC). The aircraft stalled upon takeoff at an altitude of about 1,500 feet. Mr.
4 Hijazi was not able to recover from the stall. The aircraft crashed.

5 5. My grandfather and grandmother and another occupant lost their life almost
6 instantly. My mother was pulled from the plane but died at the hospital.

7 6. My brother and I received a wrongful death recovery. The terms are confidential.

8 7. However, I have a bank account at Chase Bank which has a balance of
9 approximately \$800,000. A true and correct copy of my recent bank statement is attached hereto
10 as Exhibit 1.

11 8. I am willing to contribute up to \$450,000 towards a pay-down of the 1st loan to
12 facilitate new private financing subject to approval of this Court (which will require an estimated
13 amount of \$350,000 - \$375,000 from me and like amount from my brother) and the balance
14 towards funding a plan.

15 9. These funds would be a gift but be contingent on court approval and confirmation
16 of a feasible plan.

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct.
19

20
21 DATED: July 12, 2021

/s/ Bradley Pierce
BRADLEY PIERCE

EXHIBIT 1



JPMorgan Chase Bank, N.A.
P O Box 182051
Columbus, OH 43218 - 2051

May 07, 2021 through June 04, 2021

Account Number:

36

BRADLEY L PIERCE
194 LANTZ DR
MORGAN HILL CA 95037

CUSTOMER SERVICE INFORMATION

Web site: **Chase.com**
Service Center: **1-800-935-9935**
Deaf and Hard of Hearing: **1-800-242-7383**
Para Espanol: **1-877-312-4273**
International Calls: **1-713-262-1679**

SAVINGS SUMMARY

Chase Premier Savings

	AMOUNT
Beginning Balance	\$1,000,008.54
Deposits and Additions	7.32
Electronic Withdrawals	-200,008.54
Ending Balance	\$800,007.32
Annual Percentage Yield Earned This Period	0.01%
Interest Paid This Period	\$7.32
Interest Paid Year-to-Date	\$17.38

You could earn an even higher interest rate on your Chase Premier Savings account if you link it to a qualifying checking account. Visit any of our branches for details or call us at the telephone number on your statement.

TRANSACTION DETAIL

DATE	DESCRIPTION	AMOUNT	BALANCE
	Beginning Balance		\$1,000,008.54
05/21	05/21 Online Transfer To Chk ...0208 Transaction#: 11821686432	-100,000.00	900,008.54
06/01	06/01 Online Transfer To Chk ...0208 Transaction#: 11887124901	-100,008.54	800,000.00
06/04	Interest Payment	7.32	800,007.32
	Ending Balance		\$800,007.32

A monthly Service Fee was **not** charged to your Chase Premier Savings account. You can continue to avoid this fee during any statement period by keeping a minimum daily balance in your account of \$15,000.00 or more.
(Your minimum daily balance was \$800,000)



May 07, 2021 through June 04, 2021

Account Number:

036

IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR ELECTRONIC FUNDS TRANSFERS: Call us at 1-866-564-2262 or write us at the address on the front of this statement (non-personal accounts contact Customer Service) immediately if you think your statement or receipt is incorrect or if you need more information about a transfer listed on the statement or receipt.

For personal accounts only: We must hear from you no later than 60 days after we sent you the FIRST statement on which the problem or error appeared. Be prepared to give us the following information:

- Your name and account number
- The dollar amount of the suspected error
- A description of the error or transfer you are unsure of, why you believe it is an error, or why you need more information.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days (or 20 business days for new accounts) to do this, we will credit your account for the amount you think is in error so that you will have use of the money during the time it takes us to complete our investigation.

IN CASE OF ERRORS OR QUESTIONS ABOUT NON-ELECTRONIC TRANSACTIONS: Contact the bank immediately if your statement is incorrect or if you need more information about any non-electronic transactions (checks or deposits) on this statement. If any such error appears, you must notify the bank in writing no later than 30 days after the statement was made available to you. For more complete details, see the Account Rules and Regulations or other applicable account agreement that governs your account. Deposit products and services are offered by JPMorgan Chase Bank, N.A. Member FDIC



JPMorgan Chase Bank, N.A. Member FDIC
